

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re	:	Case No. 19-23215 (JKS)
	:	Chapter 7
	:	
Ryan Ramirez,	:	The Honorable John K. Sherwood
	:	
Debtor.	:	
	:	

APPLICATION FOR THE ENTRY OF A CONSENT ORDER EXTENDING TIME TO FILE A MOTION TO DISMISS CASE UNDER 11 U.S.C. § 707(b)(1) AND (3) AND EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER 11 U.S.C. § 727

The United States Trustee (“U.S. Trustee”), by and through counsel, in furtherance of his duties and responsibilities under 28 U.S.C. §§ 586(a)(3) and (5), hereby respectfully submits this Application for the entry of the *Consent Order Extending Time to File a Motion to Dismiss Case Under 11 U.S.C. §§ 707(b)(1) and (3) and Extending Time to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727*.

1. In support of this Application, the U.S. Trustee respectfully represents as follows: The docket for this case reflects that on July 7, 2019, Ryan Ramirez (“Debtor”) filed a voluntary

petition for relief under chapter 7 of title 11 of the United States Code (“Bankruptcy Code”).

2. The docket also reflects that a meeting of creditors pursuant to 11 U.S.C. § 341(a) was scheduled to be held on August 12, 2019.

3. The U.S. Trustee is conducting an independent review of the Debtor’s case warranting further investigation.

4. The U.S. Trustee seeks an extension of time to file a motion to dismiss or object to discharge. Debtor, through counsel, agreed to the extension.

5. Debtor is cooperating and investigation is ongoing.

6. Unless the consent order is entered, the Debtor will automatically be issued a discharge upon expiration of the current October 11, 2019, deadline, before the U.S. Trustee completes its investigation. As a result, the U.S. Trustee respectfully requests that the Court enter the Consent Order and extend the deadline for filing a motion to dismiss under 11 U.S.C. §§ 707(b)(1) and (3) or a complaint objecting to discharge under 11 U.S.C. § 727, to December 10, 2019, as agreed to by the Debtor.

7. The U.S. Trustee reserves his rights to seek any additional extensions of time for good cause shown.

Respectfully submitted,
ANDREW R. VARA
ACTING UNITED STATES TRUSTEE
REGION 3

By: /s/ Jeffrey M. Sponder
Jeffrey M. Sponder
Trial Attorney

DATED: October 8, 2019